

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court
Southern District of Texas
FILED

MAY - 2 2014

David J. Bradley, Clerk

United States of America

v.

Oscar Perez-Garza (YOB: 1991; MEX)

and

Jairo Olvera-Abdelkrim (YOB: 1993; MEX)

Case No. 11-14-0872-MDefendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2, 2014 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section*21USC841; 21USC952;
& 21USC963*Offense Description*

defendants did knowingly and intentionally possess with the intent to distribute and did knowingly and intentionally import and conspire to import approximately 26.96 kilograms of cocaine, a Schedule II controlled substance, into the United States of America from the United Mexican States.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

OK to file. TNTSean T. Greene
Complainant's signatureSean T. Greene, HSI Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 5/2/20144:53 pmPeter E. Ormsby
Judge's signatureCity and state: McAllen, TexasU.S. Magistrate Judge Peter E. Ormsby
Printed name and title

The facts set forth in this affidavit are based on my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses. This affidavit is intended to show there is probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter.

On May 2, 2014, Oscar PEREZ-Garza (hereinafter PEREZ), and Jairo OLVERA-Abdelkrim (hereinafter OLVERA), both a Mexican nationals in possession of a B1/B2 Border Crosser Cards, applied for admission to the United States of America from the United Mexican States at the port of entry in Pharr, Texas. PEREZ was driving a blue 2002 Jeep Liberty that OLVERA occupied as a passenger. U.S. Customs and Border Protection (CBP) a canine enforcement officer, who was screening vehicles in the pre-primary traffic lanes had received an alert to PEREZ's vehicle. At the primary inspection area both PEREZ and OLVERA provided CBP officers negative oral declarations. CBP officers referred PEREZ and OLVERA to the secondary inspection area where the subjects also provided negative declarations. PEREZ and OLVERA stated to the officers that they were traveling from Reynosa, Tamaulipas to Hidalgo, Texas to go shopping in Hidalgo, Texas. During the secondary inspection, officers discovered and removed a total of 25 bricks that were concealed within the tailgate, front fender area and back cargo area of the vehicle. The packages contained a white powdery substance that field tested positive for cocaine. The total weight of the packages containing cocaine was approximately 26.96 kilograms.

Homeland Security Investigations (HSI) special agents advised both PEREZ and OLVERA of their Miranda Rights. Both parties provided written waivers of their right to counsel and agreed to answer the agents' questions. During the course of the interview, both PEREZ and OLVERA admitted that they knew there were narcotics concealed within the vehicle and that they were being paid to smuggle it into the United States.